

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,  
12 Plaintiffs,  
13 vs.

14 NVIDIA Corporation,  
15 Defendant.

Case No. 4:24-cv-01454-JST  
Case No. 4:24-cv-02655-JST

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE ESI PROTOCOL AND  
PROTECTIVE ORDER SCHEDULE**

Judge: Hon. Jon S. Tigar  
Courtroom: 6 - 2nd Floor

16 Andre Dubus III, et al.,  
17 Plaintiffs,  
18 vs.  
19 NVIDIA Corporation,  
20 Defendant.

1 Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October  
2 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their  
3 respective counsel of record, hereby stipulate the following:

4 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar  
5 for an Initial Case Management Conference, (ECF No. 66);

6 2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a  
7 proposed protective order and ESI protocol order, and established a schedule and requirements for  
8 submitting briefs if Parties could not reach agreement, (ECF No. 68);

9 3. WHEREAS, the Parties submitted their respective ESI protocol and protective order  
10 proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and  
11 supplemental submissions thereafter (ECF Nos. 75, 76, 79);

12 4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present  
13 arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

14 5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed  
15 issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or  
16 competing proposals with accompanying briefs by November 4, 2024 (ECF No. 80);

17 6. WHEREAS, on November 4, 2024 the Parties stipulated to extend the deadline for  
18 submitting a stipulation or competing proposals with accompanying briefs from November 4, 2024 to  
19 November 14, 2024 (ECF No. 84), which was ordered by the Court on November 5, 2024 (ECF No. 85);

20 7. WHEREAS, the Parties have engaged in five (5) meet and confer conferences for over five  
21 hours collectively and exchanged numerous redlined drafts of the ESI protocol and protective order  
22 proposals since October 21, 2024, and have made significant progress toward narrowing the disputed  
23 issues in the respective proposals; and

24 8. WHEREAS, the Parties believe that they can make additional progress by continuing to  
25 meet and confer on the remaining disputed issues.

26 NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their  
27 respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI  
28

1 Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from  
2 November 14, 2024 to November 18, 2024.

1 Dated: November 14, 2024

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)  
4 Christopher K.L. Young (SBN 318371)  
5 Elissa A. Buchanan (SBN 249996)  
6 Evan Creutz (SBN 349728)  
7 **JOSEPH SAVERI LAW FIRM, LLP**  
8 601 California Street, Suite 1505  
9 San Francisco, California 94108  
10 Telephone: (415) 500-6800  
11 Facsimile: (415) 395-9940  
12 Email: jsaveri@saverilawfirm.com  
13 cyoung@saverilawfirm.com  
14 eabuchanan@saverilawfirm.com  
15 ecreutz@saverilawfirm.com

16 Matthew Butterick (SBN 250953)  
17 1920 Hillhurst Avenue, #406  
18 Los Angeles, CA 90027  
19 Telephone: (323) 968-2632  
20 Facsimile: (415) 395-9940  
21 mb@buttericklaw.com

22 Brian D. Clark (admitted *pro hac vice*)  
23 Laura M. Matson (admitted *pro hac vice*)  
24 Arielle Wagner (admitted *pro hac vice*)  
25 Eura Chang (admitted *pro hac vice*)  
26 **LOCKRIDGE GRINDAL NAUEN PLLP**  
27 100 Washington Avenue South, Suite 2200  
28 Minneapolis, MN 55401  
Telephone: (612)339-6900  
Facsimile: (612)339-0981  
bdclark@locklaw.com  
lmmatson@locklaw.com  
aswagner@locklaw.com  
echang@locklaw.com

*Attorneys for the Nazemian Plaintiffs and the Proposed Class*

1 Dated: November 14, 2024

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)

4 Alexander J. Sweatman (admitted *pro hac vice*)

5 Mohammed Rathur (admitted *pro hac vice*)

6 **CAFFERTY CLOBES MERIWETHER**  
7 **& SPRENGEL LLP**

8 135 South LaSalle Street, Suite 3210

9 Chicago, IL 60603

10 Tel: 312-782-4880

11 bclobes@caffertyclobes.com

12 asweatman@caffertyclobes.com

13 mrathur@caffertyclobes.com

14 David A. Straite (admitted *pro hac vice*)

15 **DiCELLO LEVITT LLP**

16 485 Lexington Avenue, Suite 1001

17 New York, NY 10017

18 Tel. (646) 933-1000

19 dstraite@dicellolevitt.com

20 Amy E. Keller (admitted *pro hac vice*)

21 Nada Djordjevic (admitted *pro hac vice*)

22 James A. Ulwick (admitted *pro hac vice*)

23 **DiCELLO LEVITT LLP**

24 Ten North Dearborn Street, Sixth Floor

25 Chicago, Illinois 60602

26 Tel. (312) 214-7900

27 akeller@dicellolevitt.com

28 ndjordjevic@dicellolevitt.com

julwick@dicellolevitt.com

Brian O'Mara (SBN 229737)

**DiCELLO LEVITT LLP**

4747 Executive Drive

San Diego, California 92121

Telephone: (619) 923-3939

Facsimile: (619) 923-4233

briano@dicellolevitt.com

*Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: November 14, 2024

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**  
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)  
6 seanpak@quinnemanuel.com  
7 50 California Street, 22nd Floor  
8 San Francisco, CA 94111  
9 Telephone: (415) 875-6600  
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)  
12 andrewschapiro@quinnemanuel.com  
13 191 N. Wacker Drive, Suite 2700  
14 Chicago, Illinois 60606  
15 Telephone: (312) 705-7400  
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)  
18 alexspiro@quinnemanuel.com  
19 51 Madison Avenue, 22nd Floor  
20 New York, NY 10010  
21 Telephone: (212) 849-7000  
22 Facsimile: (212) 849-7100

23 *Attorneys for Defendant NVIDIA Corporation*

**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 18, 2024.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Jon S. Tigar  
U.S. District Court Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 14, 2024

/s/ Joseph R. Saveri  
Joseph R. Saveri